State of California

Memorandum

To : Registration Branch Staff

Date: October 4, 1996

Place: Sacramento

Phone: 445-4377

From : **Department of Pesticide Regulation** - Barry Cortez, Chief
Pesticide Registration Branch

Subject : CHLORINATED ISOCYANURATES FOR POOLS, SPAS, AND HOT TUBS

	Chemical Code
Sodium Dichloro-s-Triazinetrione	205
Sodium Dichloro-s-Triazinetrione Dihydrate	1818
Trichloro-s-Triazinetrione	407

The above ingredients are the most commonly used of the chlorinated isocyanurates that are currently registered for use in swimming pools, spas and hot tubs in California. For spas and hot tubs, the sodium dichloros are the most commonly used (identified as No. 205 and No. 1818 in the above chemical code).

The following registrants currently have products(s) for "repackaging and/or formulating as a microbiocide" which are registered in California and are supported by adequate data. and/or letters of authorization:

Company	Firm No.
1. Derivados Electroquimicos	66750
2. ICI Americas Inc	6199 7 and 10182
3. Nissan Chemical	33906
4. Occidental Chemical Corp.	935
5. Olin Corporation	1258 and 230 (formerly FMC Corp)
6. Shikoku Chemicals Corporation	33980
7. 3V Inc.	53254
8. Clearon Corporation	69470

Products containing the above chlorinated isocyanurates which are a straight repackage of products of companies l-8 listed above may be registered without submitting the package to evaluation if it meets the following criteria*:

SURNAME

A. All items that are required to place the product into evaluation must be present.

B. A letter of authorization from the current data holder in California (Nos. l-8 listed above).

C. Proposed labeling must include and/or address the following elements:

1. Signal word and precautionary statements mitigating the hazards as identified in the above toxicity categories.'

2. The directions should provide for:

(a) A superchlorination procedure for newly filled pools.

(b) A daily maintenance level to maintain the appropriate free available chlorine residual.

(c) Instructions to test pool water with appropriate test kits to maintain the proper available chlorine level and maintain a pH of 7.2 to 7.8 (these levels may vary from 7.2 to 7.6 or 7.4 to 7.8 or other combinations).

(d) Emphasis to the consumer that the maintenance of a chlorine residual is dependent on ambient temperatures, light intensity and bather load.

(e) Provisions for superchlorination or shock treatment from time to time to maintain proper chlorination of the pool water based on the factors identified in "(d)" above .

*Products that may have a small amount of intentionally added inert ingedient(s), such as a binding agent to aid in the formation of tablets, sticks, or dye for coloration may be considered on a case-by-case basis (check with your Supervisor).

Products will require a supervisor's approval to be registered, without being submitted into evaluation if labeling contains:

A. Any slight variations in any of the elements in No. 2 (a)-(d) above.

B. If the Statement of Practical Treatment has been recently accepted by U.S. EPA, it may be in conflict with the R.E.D. or PR Notice. (S.O.P.T. may contain older version).

The product(s) will be required to be placed into evaluation if the proposed labeling contains the following:

1. Precautionary Statements that are less stringent than those listed in the above two examples. These products would require evaluation by the Medical Toxicology Branch. A letter of authorization would be required by the current data holder in California. It has been noted that an acceptable Acute Oral LD,, study that supports a Toxicity Category III is held by ICI Americas Inc.

2. No provision for superchlorination. If the proposed label lacks this element, it should be placed into efficacy review.

3. Intentionally added inert ingredients that are not used in aiding in the formation of tablets, sticks, or dye for coloration. These,products should be placed into chemistry.

Companies using a letter of authorization from Fertilizers & Chemicals Ltd., would be required to be evaluated by Medical Toxicology, Chemistry and Efficacy.